

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEGAN LUNDY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IDEANOMICS, INC., ALFRED POOR,
BRUNO WU, and CONOR MCCARTHY,

Defendants.

Case No. 1:20-cv-04944-GBD

ANDREW KIM, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

IDEANOMICS, INC., ALFRED POOR,
BRUNO WU, and CONOR MCCARTHY,

Defendants.

Case No. 1:20-cv-05203-GBD

**NOTICE OF MOTION AND MOTION TO CONSOLIDATE THE RELATED
ACTIONS, APPOINT GARY SONS AS LEAD PLAINTIFF AND APPROVE THE
SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Lead Plaintiff provisions of the Private Securities Litigation Reform Act of 1995 (“PSLRA”), codified as Section 27(a)(3) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3) (2013), and/or Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), class member Gary Sons (“Mr. Sons” or “Movant”) hereby moves the Honorable Judge George B. Daniels, United States District Court for the Southern District of New York, for entry of an Order: (1) consolidating the above-captioned actions (the “Related Actions”); (2) appointing Mr. Sons as Lead Plaintiff in this action against Ideanomics, Inc. (“Ideanomics,” “IDEX,” or the “Company”), and certain Ideanomics senior officers (referred to collectively as “Defendants”), (3) approving Mr. Sons’s selection of Hagens Berman Sobol Shapiro LLP (“Hagens Berman”) as Lead Counsel in this action, and (4) granting such other and further relief as the Court may deem just and proper.

This motion is based on this notice of motion and motion, the memorandum of law in support thereof, the declaration of Lucas E. Gilmore in support of this motion, the pleadings and records on file in this action, and any other written or oral argument or other matter that may be presented to the Court and that the Court may consider in deciding this motion.

Mr. Sons makes this motion on the grounds that the Related Actions share common factual and legal issues and on the belief that he is the most “adequate plaintiff” as defined in the PSLRA because:

1. Mr. Sons has the largest known financial interest in the relief sought by the Class. Mr. Sons has incurred substantial losses as a result of his purchase and/or acquisition of shares of Ideanomics securities; and

2. Mr. Sons satisfies the typicality and adequacy requirements of Federal Rule of Civil Procedure 23.

WHEREFORE, Mr. Sons respectfully requests that the Court: (1) consolidate the Related Actions; (2) appoint Mr. Sons as the Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (3) approve Mr. Sons's selection of Lead Counsel for the class; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: August 27, 2020

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Jason A. Zweig

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Counsel for [Proposed] Lead Plaintiff

Gary Sons

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Jason A. Zweig

JASON A. ZWEIG